

EXHIBIT 1

From: Montecalvo, Michael <Michael.Montecalvo@wbd-us.com>
Sent: Tuesday, January 22, 2019 1:39 PM
To: Jon Sasser; Dean, Jamie
Cc: Ralph Streza (ralphstreza@me.com); Jeremy Falcone; Preetha Suresh Rini
Subject: RE: Motion to File Under Seal

Jon,
As stated in the emails from Friday, our position on the O'Keefe transcript is that you can file with the limited redactions. Filing the remainder of the O'Keefe transcript under seal is not required for our purposes, but we will consent to your filing it under seal. Likewise, we consent to your filing the three referenced pages of Teter's production under seal.
PVDEF0000467 does not need to be filed under seal.
-Mike

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From: Jon Sasser [<mailto:Jon.Sasser@elliswinters.com>]
Sent: Tuesday, January 22, 2019 11:21 AM
To: Montecalvo, Michael; Dean, Jamie
Cc: Ralph Streza (ralphstreza@me.com); Jeremy Falcone; Preetha Suresh Rini
Subject: Motion to File Under Seal

Mike and Jamie,

We are moving to file Ms. Teter's medical records, Teter 01688, 01689, and 01692, as well as the entire James O'Keefe deposition transcript, under seal. Do you consent to our motion to file under seal?

Also, do you consent to our including PVDEF0000467, a Breitbart article, as non-confidential.

Please let me know ASAP, as we are filing today.

Thanks,

Jon

Jon Sasser

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